1 2 3 4 5 6	ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 ROGER P. CROTEAU & ASSOCIATES, LTD. 9120 West Post Road, Suite 100 Las Vegas, Nevada 89148 (702) 254-7775 (702) 228-7719 (facsimile) croteaulaw@croteaulaw.com Attorney for Defendant THUNDER PROPERTIES, INC.	
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10	UNITED STATES DISTRICT COURT	
11	DISTRICT OF NEVADA	
12	***	
13	PENNYMAC LOAN SERVICES, LLC, )	
14	) Plaintiff, )	
15	) Case No. 3:16-cv-00504-MMD-VPC vs.	
16	TOWNHOUSE GREENS ASSOCIATION, )	
17 18	INC.; THUNDER PROPERTIES, INC.;  GAYLE A. KERN, LTD d/b/a KERN &  ASSOCIATES LTD,  )	
19	Defendants. )	
20	)	
21	STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT	
22	(Third Request)	
23	COMES NOW Plaintiff, PENNYMAC LOAN SERVICES, LLC, and Defendants,	
24	THUNDER PROPERTIES, INC. and TOWNHOUSE GREENS ASSOCIATION, INC., by and	
25	through their undersigned counsel, and hereby stipulate and agree as follows:	
26	1. On April 5, 2018, Plaintiff filed a Motion for Summary Judgment herein [ECF	
27	#78]. Responses were initially due on April 26, 2018.	
	2. On April 23, 2018, the parties submitted a Stipulation extending the deadline to	
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respond to the Motion for Summary Judgment until May 17, 2018. [ECF #79]. Said Stipulation was granted on April 23, 2018. [ECF #80].

- 3. On May 17, 2018, the parties submitted a second Stipulation extending the deadline to respond to Motion for Summary Judgment until May 28, 2018. [ECF #81]. At the time the stipulation was submitted, the parties did not realize that Memorial Day fell on May 28, 2018. The second Stipulation was granted on May 21, 2018. [ECF #82].
- 4. Defendants' counsel have been required to continue to devote time and attention to numerous other pending legal matters since the first and second extensions of time which have detracted from the time available to prepare a response. The Memorial Day holiday also detracted from the time available to respond.
- Based upon the foregoing, Defendants have requested and shall be granted a
  further extension of time until June 8, 2018, in which to respond to the Plaintiff's
  Motion for Summary Judgment.

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6. This Stipulation is	made in good faith and not for purpose of delay.
Dated this29 <sup>th</sup>	_ day of May, 2018.
ROGER P. CROTEAU & ASSOCIATES, LTD.	AKERMAN, LLP
/s/ Timothy E. Rhoda TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 9120 West Post Road, Suite 100 Las Vegas, Nevada 89148 (702) 254-7775 croteaulaw@croteaulaw.com Attorney for Defendant Thunder Properties, Inc.	VATANA LAY, ESQ. Nevada Bar No. 12993 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 702-634-5000 vatana.lay@akerman.com Attorney for Plaintiff Pennymac Loan Services, LLC  TYSON & MENDES, LLP
	/s/ Chistopher Lund CHRISTOPHER AMMON LUND, ESQ. Nevada Bar No. 12435 3960 Howard Hughes Parkway Suite 600 Las Vegas, NV 89169 702-724-2648 clund@tysonmendes.com Attorney for Defendant Townhouse Greens Association, Inc
	By: Judge, U.S. District Court
	Dated: <u>5/31/2018</u>

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## 1 29<sup>th</sup> I HEREBY CERTIFY that on this day of May, 2018, I served via the 2 United States District Court CM/ECF electronic filing system, the foregoing STIPULATION 3 AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY 4 **JUDGMENT** (Third Request) to the following parties: 5 Thomas E. McGrath Vatana Lay 6 Akerman, LLP Tyson & Mendes, LLP 1635 Village Center Circle, Suite 200 3960 Howard Hughes Parkway 7 Las Vegas, NV 89134 Suite 600 Las Vegas, NV 89169 702-724-2648 702-634-5000 8 702-380-8572 (fax) 702-938-1048 (fax) vatana.lay@akerman.com 9 Attorney for Plaintiff tmcgrath@tysonmendes.com Pennymac Loan Services, LLC Attorney for Defendant 10 Townhouse Greens Association, Inc. Ariel E. Stern 11 Akerman LLP Betsy C. Jefferis 1635 Village Center Circle, Suite 200 Phillips Spallas & Angstdt 12 Las Vegas, NV 89134 504 S. Ninth Street 702-634-5000 Suite 115 13 702-380-8572 (fax) Las Vegas, NV 89101 ariel.stern@akerman.com 702-938-1510 14 Attorney for Plaintiff 702-938-1511 (fax) Pennymac Loan Services, LLC bjefferis@psalaw.net 15 Attorney for Defendant Darren T Brenner Townhouse Greens Association, Inc. 16 Akerman LLP 1635 Village Center Circle, Suite 200 Karen M. Ayarbe 17 Las Vegas, NV 89134 Kern & Associates, Ltd. 702-634-5000 5421 Kietzke Lane, Suite 200 18 702-380-8572 (fax) Reno, NV 89511 775-324-5930 darren.brenner@akerman.com 19 Attorney for Plaintiff 775-324-6173 (fax) Pennymac Loan Services, LLC karenayarbe@kernltd.com 20 Attorney for Defendant Gayle A. Kern, Ltd. Christopher Ammon Lund 21 Tyson & Mendes LLP 3960 Howard Hughes Parkway Gayle A. Kern 22 Suite 600 Kern & Associates, Ltd. Las Vegas, NV 89169 5421 Kietzke Lane, Ste. 200 23 702-724-2648 Reno, NV 89511 702-938-1048 (fax) 775-324-5930 24 clund@tysonmendes.com 775-324-6173 (fax) Attorney for Defendant gakltd@kernltd.com 25 Townhouse Greens Association, Inc. Attorney for Defendant Gayle A. Kern, Ltd. 26 /s/ Timothy E. Rhoda

**CERTIFICATE OF SERVICE** 

ASSOCIATES, LTD.

An employee of ROGER P. CROTEAU &